

# **EXHIBIT**

# **B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Norfolk Division)**

VS TECHNOLOGIES, LLC, )  
Plaintiff )  
vs. ) CIVIL CASE NO: 2:11cv43 (HCM)(FBS)  
TWITTER, INC. )  
Defendant. )

**DECLARATION OF TODD BLUMENFELD**

I, Todd Blumenfeld, hereby declare as follows:

1. I am an attorney with the law firm of Friedman, Suder & Cooke, counsel for Plaintiff VS Technologies, LLC in the above-referenced matter.
2. I make this declaration in support of Plaintiff's Opposition to Defendant Twitter, Inc.'s Motion to Transfer Pursuant to §1404(a). I am competent to testify as to the matters stated herein and base this declaration on my personal knowledge.
3. Attached as Exhibit B1 is a true and correct copy of Table C-5 to the Federal Judicial Caseload Statistics which provides caseload statistics for the United States Federal Courts. The complete statistics can be found at <http://www.uscourts.gov/Statistics/FederalJudicialCaseloadStatistics/FederalJudicialCaseloadStatistics2010.aspx>
4. Attached as Exhibit B2 is a true and correct copy of a printout of a study from PricewaterhouseCoopers LLP entitled "2010 Patent Litigation Study, The Continued Evolution of Patent Damages Law, Patent Litigation Trends 1995-2009 and the impact of recent court decisions on damages" (2010), available at <http://www.pwc.com/us/en/forensic-services/publications/assets/2010-patent-litigation-study.pdf>

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed April 19, 2011 in Fort Worth, Texas

A handwritten signature in black ink, appearing to read "Todd Blumenfeld", is written over a horizontal line.

Todd Blumenfeld